

## UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Division

NOV 18 2019

JULIA O'DUDLEY, CLERK  
BY:   
DEPUTY CLERKCurtis-Craig Littlejohn

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Lynchburg Department of Taxation

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 6:19 CV 00082  
(to be filled in by the Clerk's Office)Jury Trial: (check one)  Yes  No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Curtis-Craig Littlejohn  
3 High Street Apt 1  
Raaphorst Dutchess  
New York 12501  
(845) 293-9984  
CurtisLittlejohn33@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
 Job or Title (*if known*)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (*if known*)

James Elliot  
~~Tax Lawyer~~  
 7100 George Washington Memorial Highway  
 Yorktown  
 Virginia 23690  
 (757) 898-7000

## Defendant No. 2

Name  
 Job or Title (*if known*)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (*if known*)

Lynchburg Department of Taxation  
 900 church Street  
 Lynchburg Campbell  
 Virginia 24501  
 (434) 455 4212

## Defendant No. 3

Name  
 Job or Title (*if known*)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (*if known*)

\_\_\_\_\_

## Defendant No. 4

Name  
 Job or Title (*if known*)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (*if known*)

\_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

*(a) Schedule "A"* List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- ① Bill of rights Number 5 (Treaty of peace 1783)
- ② Bill of rights Number 7 (Declaration of independence 1776)
- ③ Bill of rights Number 10 (Articles of Confederation 1778)
- ④ International UCC financing Statement Administered by Secured Party Title 46 USC 31343 and Article 1 and 5 of International Convention on Maritime Liens
- ⑤ Non Negotiable Private Security Agreement with IRS Trust Number and papers from IRS

*B. If the Basis for Jurisdiction Is Diversity of Citizenship* Violating Secured lien of 100,000.00

- ⑥ Disregarding International Commercial lien for 100,000 for personal gain violating Bill of Rights

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) Curtis-Craig Littlejohn, is a citizen of the State of (name) New York Republic.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) LYNCHBURG TAX DEPARTMENT, is incorporated under the laws of the State of (name) VIRGINIA, and has its principal place of business in the State of (name) VIRGINIA. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy \$100,000 and liens that is superior with UCC paper work and Security agreement.

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$100,000 paid \$64,000 For House in 2009

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

### IV.

Did not give Plaintiff opportunity to make reasonable instalment payment and not sending notice to New York Sealing house was relief being foreclosed on. Stop foreclosure to make reasonable payments

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Restraining Order to ask the court to stop the foreclosure to make reasonable instalment payments instead of full price that can be paid Plaintiff has a job and can make instalment payments

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

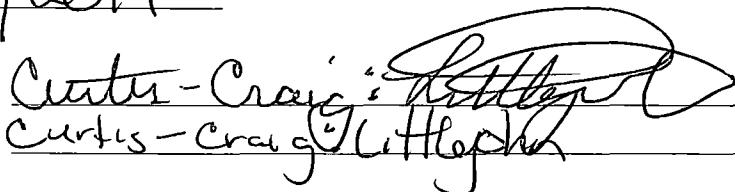
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

11/3/2019

Signature of Plaintiff



Printed Name of Plaintiff

**B. For Attorneys**

Date of signing:

Signature of Attorney

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Bar Number

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Name of Law Firm

\_\_\_\_\_  
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Street Address

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State and Zip Code

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Telephone Number

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E-mail Address